201-15944

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06/23/2005 07:17 PM

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Subject: Environmental Defense comments on Carbamic Acid, 1H-Benzimidazol-2-YL-, Methyl Ester (CAS# 10605-21-7)

(Submitted via Internet 6/23/05 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, lucierg@msn.com and Akiley@regnet.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Carbamic Acid, 1H-Benzimidazol-2-YL-, Methyl Ester (CAS# 10605-21-7)**.

The robust summaries for CAS# 10605-21-7 were submitted by Troy Corporation. A test plan was not submitted because the sponsor does not propose the conduct of additional studies. Although the robust summaries are informative and objective, we do recommend that the sponsor provide a formal test plan including summary tables of existing data.

The sponsor states that carbamic acid, 1H-benzimadazole-2-YL-, methyl ester, abbreviated as BCM, is covered under FIFRA (registration 365-81) and that it is not aware of uses that would be regulated under TSCA. We commend the sponsor for preparing and submitting the robust summaries notwithstanding. In any event, it is apparently produced in amounts greater than 1 million pounds per year so it is in that sense appropriate to be considered an HPV chemical (there appear to be other producers of this chemical, presumably for TSCA uses, as indicated by data from the 2002 TSCA Inventory Update).

BCM is used in fungicide formulations in the manufacture of paints, coatings, plasters, stuccos, sealants and other products. Therefore, there is clear opportunity for environmental and human exposures. However, no data are presented to indicate the magnitude of exposure. If such data are available, they should be provided in a revised submission. This is an important issue because existing data demonstrate that BCM is stable in water, not biodegradable and toxic to aquatic organisms.

Although a test plan for BCM was not submitted, the robust summaries were, in general, informative and objective. We agree that no new studies are needed -- provided that the following points are adequately addressed in a revised submission.

1. The sponsor needs to be consistent in the identification of BCM throughout the submission. It is called at least six different names in the robust summaries, including carbendazim, mergal BCM and methoxycarbonylamino-benzimadazole. It appears that all of these are the same chemical or technical grade material, but this needs to be confirmed before the submission can be deemed acceptable.
2. BCM appears to be a genotoxic non-carcinogen. Could the lack of carcinogenic activity be due to the low doses used in the chronic bioassay?
3. The lifetime bioassay in rodents is used to meet the requirements for the repeat dose toxicity endpoint. While this may be acceptable, the histological examinations provided in the robust summaries are not adequate to determine if the criteria for the repeat dose endpoint are met. Details on tissues examined and methods employed need to included in a revised submission.
4. BCM appears to be toxic to algae and aquatic invertebrates, but not to fish. Does the lack of detectable fish toxicity reflect the low water solubility of BCM or an inherent resistance to toxicity?

Thank you for this opportunity to comment.

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